

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. BAM L.P., MICHAEL MANN, and MERYL MANN, Defendants.	Adv. Pro. No. 10-04390 (SMB)

STIPULATION FOR ENTRY OF SCHEDULING ORDER

WHEREAS, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff,

individually, and defendants BAM L.P., Michael Mann, and Meryl Mann (“Defendants,” and together with the Trustee, the “Parties”), by and through their respective counsel, and consistent with the authorization provided by the Court at the March 29, 2017 pretrial conference permitting the Parties to file summary judgment motions pursuant to Local Bankruptcy Rule 7056, met and conferred regarding the following schedule.

IT IS THEREFORE MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Defendants as follows:

1. The deadline for the Parties to file a Joint Statement of Undisputed Material Facts is May 3, 2017. In the event the parties cannot submit the Joint Statement of Undisputed Material Facts by this date, the Parties shall have a conference on May 3, 2017, at 10:00 a.m. before the Honorable Stuart M. Bernstein, United States Bankruptcy Court Judge, to inform the Court of their progress.
2. The deadline for the Parties to file their respective Motions for Summary Judgment (the “Motions”) will be 45 days after the Court approves the Joint Statement of Undisputed Material Facts.
3. The deadline for the Parties to file oppositions to the Motions will be 45 days after the deadline for filing the Motions.
4. The deadline for the Parties to file replies to the oppositions to the Motions will be 30 days after the deadline for filing oppositions to the Motions.
5. Oral argument on the Motions will be heard on a date to be set by the Court.
6. Except as expressly set forth herein, the Parties to this stipulation reserve all rights

and defenses they may have, and no rights or defenses are waived by entering into this Stipulation.

Dated: April 20, 2017
New York, New York

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LLC and the Estate of Bernard L. Madoff*

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Attorneys for Defendants

SO ORDERED

Dated: April 21, 2017
New York, New York

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE